REMARKS/ARGUMENTS

Status of the application

Claims 1-2, 5-10, 13-28, 30-44, and 46-53 have been examined and stand rejected in view of prior art. The pending claims have been amended to further clarify the claimed subject matter. New claims 55-77 are computer-readable storage medium counterpart claims to currently pending method claims. Reexamination and reconsideration are respectfully requested.

General

A. Section 112, second paragraph rejection

Claim 51 is rejected under 35 U.S.C. § 112, second paragraph, as allegedly indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Specifically, the Office Action contends that claim 51's limitation reciting "wherein the request for information does not include any value for a parameter required by said particular web service" is in direct contrast to the limitation of claim 1 reciting "the first input data including a value that corresponds to a parameter required by the particular web service". To resolve any potential ambiguity of the previously presented set of claims, claim 1 has been amended to recite "first parameter" and claim 51 has been amended to recite "second parameter". Removal of the Section 112, second paragraph rejection is respectfully requested.

Prior art rejection

Claims 1-2, 5-10, 13-28, 30-44 and 46-54 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Ehrlich et al U.S. Patent Pub. No. 2002/0156685 (hereinafter "Ehrlich") in view of Li et al U.S. Patent No. 6,691,760 (hereinafter "Li"). This rejection is respectfully traversed.

Claims 1 now recites:

> 1. A method for handling requests for web services, the method comprising the computer-implemented steps of:
> receiving at a web services broker, from a particular instance of a client application, a request for information, wherein said request includes an identification of a particular web service from which said particular instance wants said requested information, the request having first input data, the first input data being in a form that cannot be used by said particular web service to service requests for said information, the first input data including a value that corresponds to a first parameter required by the particular web service;
> wherein the particular web service serves as the source of said requested information, and is separate from the web services broker;

wherein the particular instance of said client application is separate from the web services broker;

in response to receiving said request, the web services broker

accessing, based on said identification of said particular web service,

transformation information that specifies,

how to transform said first input data associated with said request to second input data that said particular web service can use to service requests for said requested information, and

how to invoke said particular web service in a manner required by said particular web service, to obtain said requested information from said particular web service;

transforming said first input data to said second input data, wherein transforming the first input data includes changing said value, based on said transformation information, to create a changed value, wherein changing said value includes performing a lookup operation, based on said value, to identify the changed value; and

invoking, in said manner required by said particular web service, said particular web service to obtain said requested information from said particular web service;

wherein said requested information is obtained from said particular web service by providing the changed value to the particular web service as a value for said first parameter.

(Emphasis added.) At least the above-bolded feature of Applicant's claim 1 is not taught or in any way rendered obvious by Ehrlich and Li, individually or in combination.

The present Office Action agrees that Ehrlich does not satisfy the following feature of claim 1 related to a web services broker transforming input data received in a request for information from a client application:

transforming said first input data to said second input data, wherein transforming the first input data includes changing said value, based on said transformation information, to create a changed value

Applicant's claim 1 has been amended to clarify that not only is the "transformation information" of claim 1 used to transform data output by a client application into form that a web service can use as input data to service requests, but it also used to obtain information required by the web service using a lookup operation. Specifically, claim 1 now recites (in amended form):

transforming said first input data to said second input data, wherein transforming the first input data includes changing said value, based on said transformation information, to create a changed value, wherein changing said value includes performing a

lookup operation, based on said value, to identify the changed value;

Support for this amendment can found in at least paragraphs [0045]-[0048] of Applicant's specification.

For the same reasons that Ehrlich does not teach or suggest the transforming feature of Applicant's previously presented claim 1, Ehrlich also does not satisfy the transforming limitation of Applicant's amended claim 1 as presented herein.

Li discloses a service for transforming one XML document to another using Extensible Stylesheet Language Transformation ("style sheets"). However, Li does not disclose performing any sort of lookup operation to change an input value as part of transforming an XML document. With respect to how Li's service transforms an XML document using a style sheet, Li states at col. 11, lines 57-67:

> By way of illustration but not of limitation, templates may be provided as style sheets, as shown in the example document 400 of FIGS. 4A and 4B which provides an Extensible Style sheet Language ("XSL") style sheet. In this case, the transformations may be processed by a style sheet engine of the prior art. This example style sheet 400 specifies rules and actions for use in transforming documents containing flight information. (Interpretation of these rules and actions will be obvious to one of skill in the art, and a description thereof is not deemed necessary for purposes of the present invention.)

The "rules and actions" referred to in the above cited portion of Li are about style sheets rules for transforming a source tree (i.e., a source XML document represented as a tree of nodes) into a result tree (i.e., a transformed XML document represented as a tree of nodes) through pattern matching and application of style sheet templates. The "rules and actions" of Li are **not** about changing a value by performing a lookup operation, based on the value, to identify a changed value. In contrast to the transformation capabilities provided through the use of Li's style sheets, the transformation information of claim 1 is used to transform an input value to a changed value by performing a lookup operation, based on the input value, to identify the changed value. Li's style sheets do not provide such transformation capability. Therefore, Li, like Ehrlich, also does not satisfy the following feature of Applicant's claim 1 because Li, like Ehrlich, does not provide any sort of capability to transform an input value to a changed value by performing a lookup operation, based on the input value, to identify the changed value:

transforming said first input data to said second input data, wherein transforming the first input data includes changing said value, based on said transformation information,

to create a changed value, wherein changing said value includes performing a lookup operation, based on said value, to identify the changed value;

As both Li and Ehrlich lack this feature of Applicant's claim, a combination of Li and Ehrlich would not satisfy Applicant's claim 1 as a whole. Applicant's other independent claims 17, 49, and 50 recite a similar feature and are therefore allowable over Li and Ehrlich for at least the same reasons.

In rejecting claim 51, the Office Action repeats the rejection under the combination of Li and Ehrlich above and further relies on Li for the prospect of teaching the additional transformation features of claim 51. In particular, claim 51 recites:

51. The method of Claim 1,

wherein the request for information does not include any value for a second parameter required by said particular web service;

wherein the step of transforming includes supplementing the first input data with a value for said second parameter.

Claim 51 is allowable for at least the reasons stated above. Further, Claim 51 is allowable for the following additional reasons. The Office Action equates Li's "parameter values for matching against previously-stored recognition logic to select a stored template" as disclosed at Li, col. 13, lines 55-col. 14, line 10 with Applicant's "second parameter required by said particular web service" of claim 51. However, Li's "parameter values for matching against previously-stored recognition logic to select a stored template" are values that are included (i.e., "passed") in a request, not values that are **not** included in a request In particular, Li states at col. 14, lines 5-10:

> When a registration handle was not passed, Block 750 checks to see if values to use with recognition logic were passed. If so, then these values are used to retrieve a stored template (Block 760); **otherwise**, the depicted logic assumes that a template was passed, and control transfers directly to Block 770 to apply this template.

(Emphasis added.) The "otherwise" in the above-cited portion of Li makes clear that if values to use with recognition logic are not passed, there is no supplementing operation performed to provide them. In contrast, Applicant's claim 51 expressly requires that the value for the second parameter be provided by "supplementing the first input data with a value for said second parameter". As clear from the above-cited portion of Li, the logic relies on parameters passed to

it and does not supplement for any missing parameters.

Moreover, in Applicant's claim 51 the claimed "second parameter" is a parameter required the by claimed "particular web service". As expressly required in Applicant's claim 1, from which Claim 51 depends, the claimed "particular web service" is the web service "from which said particular instance [of the client application] wants said requested information". The logic in the above-cited portion of Li that receives the "parameter values for matching against previously-stored recognition logic to select a stored template" is embodied in Li's transformation service (see transformation service 233 of Li, Fig. 2) and **not** the service from which the user wants requested information (see business partner service 260 of Li, Fig. 2). Further, nothing in Li describes the transformation service providing those "parameter values" to a business partner service, let alone supplementing for missing "parameter values" and providing the supplemental values to a business partner service. In fact it would not make sense for Li's transformation service to do so because Li's "parameter values for matching against previously-stored recognition logic to select a stored template" are optional parameters of Li's transformation service and have nothing to do with the parameters required by a business partner service.

Based on the foregoing, Applicant respectfully submits that claim 51 recites additional features that independently render it patentable over Ehrlich and Li.

The pending claims not discussed so far are dependant claims that depend on an independent claim that is discussed above. Because each dependant claim includes the features of claims upon which they depend, the dependant claims are patentable for at least those reasons the claims upon which the dependant claims depend are patentable. Removal of the rejections with respect to the dependant claims and allowance of the dependant claims is respectfully requested. In addition, the dependent claims introduce additional features that independently render them patentable. Due to the fundamental differences already identified, a separate discussion of those features is not included at this time.

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Conclusion

For the reasons set forth above, all of the pending claims are now in condition for allowance. The Examiner is respectfully requested to contact the undersigned by telephone relating to any issue that would advance examination of the present application.

A petition for extension of time, to the extent necessary to make this reply timely filed, is hereby made. If applicable, a check for the petition for extension of time fee and other applicable fees is enclosed herewith. If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,

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